

**FILED**UNITED STATES DISTRICT COURT  
ALBUQUERQUE, NEW MEXICO

DEC 11 2023

MITCHELL R. ELFERS  
CLERK

Ronnie J Thomas  
 Name  
4425 11st nw Albuquerque  
N.M. 87107  
 Address

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

Ronnie J. Thomas, Plaintiff  
 (Full Name)

CV 23-1098  
 CASE NO.

(To be supplied by the Clerk)

v.

, Defendant(s)

Linda BridgeCIVIL RIGHTS COMPLAINT  
PURSUANT TO 42 U.S.C. §1983

## A. JURISDICTION

1) Ronnie J. Thomas, is a citizen of albuquerque n.m  
 (Plaintiff) (State)  
 who presently resides at 4425 11st nw Albuquerque n.m  
 (Mailing address or place of confinement)  
87107

2) Defendant Linda Bridge is a citizen of  
 (Name of first defendant)  
Albuquerque n.m. 87106, and is employed as  
 (City, State)  
The Director of Section 8. At the time the claim(s)  
 (Position and title, if any)

alleged in this complaint arose, was this defendant acting under color of state law?

Yes  No  If your answer is "Yes", briefly explain:

The Failure to Answer the Plaintiff "Complaints  
By Section 8 policys Under Fair housing Act-  
and under the "Due process Clause And under the  
"Equal protection Clause the "Plaintiff Believe the personnel  
of Section 8 Violated his Rights to Due process.

3) Defendant Thea Guerin is a citizen of  
(Name of second defendant)

Albuquerque nm 87106, The Deputy Director and is employed as  
(City, State)

of the Section 8 Program. At the time the claim(s)  
(Position and title, if any)

alleged in this complaint arose, was this defendant acting under color of state.

Yes  No  If your answer is "Yes", briefly explain:

By not looking In to the Complained And not Answering the  
Complained At All when File And By not Following "protocol  
Section 8 policy's. Also "The program manager" Esther Lucero

(Use the back of this page to furnish the above information for additional  
defendants.)

- 4) Jurisdiction is invoked pursuant to 28 U.S.C. §1333(3), 42U.S.C. §1983. (If you  
wish to assert Jurisdiction under different or additional statutes, you may list them  
below.)

## B. NATURE OF THE CASE

- 1) Briefly state the background of your case.

The Plaintiff Reserves the rights to ~~complain~~ complain to this  
Complained with any Information he may have along with  
Witnesses and with any documents that I may have.

Case 1:23-cv-01098-KK Document 1 Filed 12/11/23 Page 3 of 30  
The Plaintiff was on Federal probation In 2016 "when I was ordered By my Federal probation officer "Aaron Givens that was my "Assign ~~to~~ probation officer to apply For housing And I Apply to the section 8 program "Around 2017 "or And this Application was done By the Awakening And "mental health And Substance Abuse program my Counselor name I" \_\_\_\_\_ that Submitted my Section 8 Application By using Section 8 "Website.

Summary of some accounts And events And Issues For the "Honorable Court to rule on.

The Plaintiff was given A #600. on the Section 8 list And move up on the list to #63 or And was told I would Be given my Section 8 housing Voucher within two months.

Without Any "Notice By Section 8 "I was told By Phone that I would had to "reapply to A new lottery System So I Did apply And I Also tried to Address this matter By Phone with Somebody within the Section 8 Administration And I Also File Complaints with Section 8 with "no resolve As to having my Complaints Answered By Section 8 "policies or By protocol so we could have this resolve By the Complaint policies.

### C. CAUSE OF ACTION

- 1) I allege that the following of my constitutional rights, privileges or immunities have been violated and that the following facts form the basis for my allegations: (If necessary, you may attach up to two additional pages (8 1/2" x 11") to explain any allegation or to list additional supporting facts.

A)(1) Count I: By not Completing the Initial Section 8 Application By Section 8 rules And Guidelines And regulations under Fair housing Act.

(2) Supporting Facts: (Include all facts you consider important, including names of persons involved, places and dates. Describe exactly how each defendant is involved. State the facts clearly in your own words without citing legal authority or argument.)

Fact had not Answer Any oF the Completions File on record By Section 8 policys protocols to Be Follow By Section 8 And By Section 8 Breaching of the Section 8 Contract.

The Plaintiff Also reserves the rights to Amend to this Action Also For other relief As to Damage's And In there "Individual Capacity's Also.

B)(1) Count II:

(2) Supporting Facts:

C)(1) Count III:

(2) Supporting Facts:

*See supporting documents and exhibits*

*A-B-C-D-E*

D) PREVIOUS LAWSUITS AND ADMINISTRATIVE RELIEF

- 1) Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to the conditions of your imprisonment?

Yes  No  If your answer is "YES", describe each lawsuit. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

- a) Parties to previous lawsuit.

Plaintiffs: \_\_\_\_\_

Defendants: \_\_\_\_\_

- b) Name of court and docket number:

- c) Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

- d) Issues raised: \_\_\_\_\_

- e) Approximate date of filing lawsuit: \_\_\_\_\_
- f) Approximate date of disposition: \_\_\_\_\_
- 2) I have previously sought informal or formal relief from the appropriate administrative officials regarding the acts complained of in Part C. Yes  No  If your answer is "Yes", briefly describe how relief was sought and the results. If your answer is "No," briefly explain why administrative relief was not sought.

Through the Complaint process with no resolve  
see exhibits A-B-C-D and E File with section 8

#### E. REQUEST FOR RELIEF

- 1) I believe that I am entitled to the following relief:

To have my section 8

To address under the Fair housing act Violation not answering  
the Complaints File to Section 8 and address the "~~parties~~"  
For not answering the Complaints.

The Plaintiff also Reserve the rights to amend any other  
damages to this action.

To also address Individuals In there Individual Capacity.

\_\_\_\_\_  
Signature of Attorney (if any)

Ronnie Thomas  
\_\_\_\_\_  
Signature of Petitioner

Attorney's full address and telephone  
number.

**DECLARATION UNDER PENALTY OF PERJURY**

The undersigned declares under penalty of perjury that he is the plaintiff in the above action, that he has read the above complaint and that the information contained therein is true and correct. 28 U.S.C. Sec. 1746. 18 U.S.C. Sec. 1621.

Executed at \_\_\_\_\_ on \_\_\_\_\_ 20\_\_\_\_.  
(Location) (Date)

\_\_\_\_\_  
(Signature)

Exhibit A  
al  
**Albuquerque Housing Authority**

Document(s) for Housing Specialist



To / A: Thea

Receipt #: 36500

From / De: Ronnie Thomas

Date / Fecha: 10.28.2022

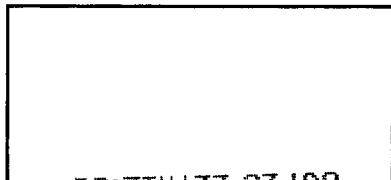
Email: \_\_\_\_\_

Phone /  
Telefono #: \_\_\_\_\_

Regarding /  
Referente: \_\_\_\_\_

Notes / Notas: formal complaint

Receipt Stamp



EQUAL HOUSING  
OPPORTUNITY AGENCY



To Section 8

Ronnie Thomas The Complaint  
is amending to the other Complaints  
that has been file on this Matter.

The Plaintiff Believe That his  
Constitutional rights to Due process  
has Been Violated By Not following  
the applicational rules and regulation  
and initial guidelines that we  
agreed to under the section 8 Contract  
that I agreed to.

The Plaintiff truly Believe that  
when the section 8 record is addressed  
that record proper can show that  
certain individuals Tensionly and  
with Malice address my application  
with Bias intent to Not address

(2)

To the initial problem and  
this is the "Initial Contract  
with section 8.

Therefore The Plaintiff Is asserting  
his Constitutional rights to have  
this Matter investigate By the  
departments that are over  
section 8 Because I Believe this  
issue should not Be address  
in house.

I am also requesting a Certified  
written response Back on all  
of the Complaints.

Sincerely  
Ronnie Thomas

Dated on 10- - 22

**Albuquerque Housing Authority**

Document(s) for Housing Specialist

ALL SECTION 8RONALD THOMASEmail: JJARDEN@SALUD.UNM.EDU

Receipt#: \_\_\_\_\_

6/5/23Regarding: PRIORITY & RECENT COMPLAINTSPhone: SEE BELOW

Notes / Notas: REQUESTING ALL COPIES OF  
ALL DOCUMENTATION & COMPLAINTS  
REGARDING HIS CASE FROM 2017  
TO PRESENT

**Receipt Stamp**RECEIVED DATERONALD THOMAS  
~~531~~-220-2198JONATHAN JARDEN CPSW  
505-525-1057EQUAL HOUSING  
OPPORTUNITY AGENCY

White/ Blanco Copy - Client

Pink / Rosado Copy- Front Desk/Repcion

Canary / Amarillo Copy - Housing Specialist



850H-18L-509



ALBUQUERQUE HOUSING AUTHORITY

Carolyn Montoya

Senior Office Assistant - Admin

P: 505.764.3925

1840 University Blvd SE

P: 505.764.3915 1840 University Blvd SE

Executive Assistant

Mundy Petoff

ALBUQUERQUE HOUSING AUTHORITY



ALBUQUERQUE HOUSING AUTHORITY

Brian A. Eagan

Attorney

P: 505.764.3951

1840 University Blvd SE

ALBUQUERQUE HOUSING AUTHORITY

Matthew Archuleta

Public Housing Program Manager

P: 505.764.3923

1840 University Blvd SE



ALBUQUERQUE HOUSING AUTHORITY

Thea Guerin

Deputy Director

P: 505.764.3991

Albuquerque Housing Authority

Document(s) for Housing Specialist

exhibit C  
al



To / A: Thea

From / De: Ronnie Thomas

Email: \_\_\_\_\_

Regarding /  
Referente: \_\_\_\_\_

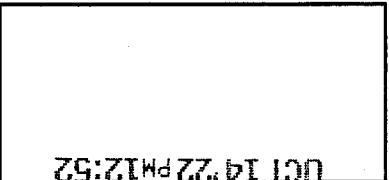
Notes / Notas: written complaint  
\_\_\_\_\_  
\_\_\_\_\_

Receipt #: 36222

Date / Fecha: 10-14-2022

Phone /  
Teléfono #: 531-220-2198

Receipt Stamp



2023-10-14 14:22:52



White/ Blanco Copy - Client

Pink / Rosado Copy- Front Desk/Recepcion



Canary / Amarillo Copy - Housing Specialist

Albuquerque Housing Authority

Document(s) for Housing Specialist



al

To / A: Thea

From / De: Ronnie Thomas

Email: \_\_\_\_\_

Regarding /  
Referente: \_\_\_\_\_

Receipt #: 36222

Date / Fecha: 10-14-2022

Phone /  
Telefono #: 531-220-2198

Notes / Notas: written complaint

Receipt Stamp

ZG:ZTHd77.b1.100



EQUAL HOUSING  
OPPORTUNITY AGENCY

White/ Blanco Copy - Client

Pink / Rosado Copy- Front Desk/Repcion



Canary / Amarillo Copy - Housing Specialist

To section 8

To Whom It May Concern

My Name Ronnie J Thomas or Ronald  
I am filing This action on section 8  
for the following reasons

I Believe that I has Been discriminated  
against.

The plaintiff file for section 8  
in 2016 the plaintiff with from  
Number 800 on the to Number 62  
on the section 8 list and was on  
track to receive my section 8 Voucher  
after waiting for years under that  
process and under a fair and  
impartial process.

The section 8 process was as  
follow you applied and received  
a Number on the section 8 list

and Moved up on the list.

then sections Change these section 8  
policies to a lottery system that  
Bias and also prejudice and By application.

This above process is unfair to the  
minorities Citizens of albuquerque  
as exhibited as to population in  
albuquerque "white ~~7.09%~~<sup>37%</sup> and Hispanic  
~~37%~~<sup>37%</sup>  
Blacks or 3.09%.

so this lottery process favor only  
whites and Hispanic population  
and is unfair ~~to~~ to the Black  
population the New lottery process's  
and deny Blacks of a fair and  
impartial housing process

It should Be Noted that I  
have tried to resolve this issue  
and Matter with the following  
government department  
The "Mayor sections and the was  
rubber Stamp as will as Black Ball  
and to prove my point look at  
the section 8 records on me and  
the Complaints that I file  
with section 8.

I Believe that section 8 New  
policies discrimination and Bias  
and prejudice Norm when look in  
of fair and impartial way.

Therefore the plaintiff is requesting the following relief and damages:

To receive his section 8 Voucher immediately

For Damages that occurred By Negligent handling of this above Matter

To have ~~a~~ a full investigation into this Matter

This may also <sup>be</sup> used as a "Notice of Civil action under the due process clause and the equal protection clauses.

Sincerely submitted By

Ronnie or Ronald J Thomas

I am also requesting that this action be send to Main Branch and regional offices of section 8 Thank you

To Section 8

10-14-22

This is a amendment to the  
complaint that was file on  
10-30-22 with no "answer and no  
resolve.

Therefore

I am requesting that all of my  
complaints and letters file be  
forward to the "Regional section 8  
office for processing.

I am also reserving the right  
to address the complaints with  
a statement of facts and issues  
when the Regional office takes over  
this Matter in a "fair and impartial  
process.

Sincerely submitted  
on 10-14-22 By Ronnie Thomas

Religious Discrimination  
leg

**Albuquerque Housing Authority**Exhibit - E  
al

Document(s) for Housing Specialist

To / A: ComplaintFrom / De: Ronnie / Ronald Thomas

Email: \_\_\_\_\_

Regarding /  
Referente: \_\_\_\_\_Notes / Notas: written complaint  
\_\_\_\_\_  
\_\_\_\_\_Receipt #: 35447Date / Fecha: 9-30-2022Phone /  
Telefono #: 531-220-2198

Receipt Stamp

SEP 30 22 AM 10:12



White/ Blanco Copy - Client

Pink / Rosado Copy- Front Desk/Repcion



Canary / Amarillo Copy - Housing Speciali.

To sections

To It May Concern

My Name Ronnie J Thomas or Ronald  
I am filing This action on section 8  
for the following reasons

I Believe that I has Been discriminated  
against.

The plaintiff file for section 8  
in 2016 the plaintiff with from  
Number 800 on the to Number 62  
on the section 8 list and was on  
track to receive my section 8 Voucher  
after waiting for years under that  
process and under a fair and  
impartial process.

The section 8 process was as  
follow you applied and received  
a Number on the section 8 list

and Moved up on the list.

Then section 8 Change these section 8 policies to a lottery system that Bias and also prejudice and By application.

This above process is unfair to the minorities Citizens of Albuquerque as exhibited as to population in Albuquerque "white ~~70%~~<sup>37%</sup> and Hispanic ~~30%~~<sup>37%</sup> Blacks or 3.09%.

So this lottery process favor only whites and Hispanic population and is unfair ~~to~~ to the Black population the New lottery process's and deny Blacks of a fair and impartial housing process.

It should Be Noted that I  
have tried to resolve this issue  
and Matter with the following  
government department

The "Major sections and the was  
rubber Stamp as will as Black Ball  
and to prove my point look at  
the section 8 records on me and  
the Complaints that I file  
with section 8.

I Believe that section 8 New  
policies discrimination and Bias  
and prejudice Norm when looking  
of fair and impartial way.

Therefore The plaintiff is requesting the following relief and damages:

To receive his section 8 Voucher immediately

For Damages that occurred By Negligent handling of this above matter

To have ~~a~~ a full investigation into this Matter

This may also <sup>be</sup> use as a "Notice of Civil action under the due process clause and the equal protection clauses.

Sincerely submitted By

Ronnie or Ronald J Thomas

I am also requesting that this action be send to Main Branch and regional offices of section 8 Thank you

## Albuquerque Housing Authority

Document(s) for Housing Specialist

al.

To / A: ComplaintFrom / De: Ronnie/Ronald Thomas

Email: \_\_\_\_\_

Receipt #: 35447Date / Fecha: 9-30-2022Regarding /  
Referente: \_\_\_\_\_Phone /  
Telefono #: 531-220-2198Notes / Notas: written complaint  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Receipt Stamp

SEP 30 2022 AM10:12



White/ Blanco Copy - Client

Pink / Rosado Copy- Front Desk/Repcion

Canary / Amarillo Copy - Housing Specialist



(1)

To section 8

Ronnie J. Thomas

The Plaintiff is requesting for

a statement of facts as to Not

"answering My Complaints file

on the section 8 records.

It should Be Noted that section 8

has "Never answer any of My

Complaints from 2017 to Now By

section 8 policy's are policy protocols \*

The plaintiff Believe that section 8

has "Violated these or rules

and policy and regulation's procedures.

(2)

Because section 8 has Not try  
to follow policy "I am requesting  
that "all Complaints and documents  
Be forward to the section 8  
"regional and "Main Offices  
of section 8 for there" inspection.  
The Plaintiff is "Respectfully  
requesting that all Complaints  
along with all "documentation  
Be send to all heads of departments  
of section 8 for "review and a "decisions  
under the "Due process Clause and  
equal protection Clause" of

(3)

That is Guaranteed to me  
under the Due process Clause  
and the Equal protection Clause  
of the United States Constitution.

The plaintiff Believe that the  
total "disregard of the section 8  
policy along with the initial  
application Not Being follow  
By the application that I  
signed up under was with Malice  
and a Reckless disregard for my  
rights under initial Contract.

(4)

The plaintiff believe that the "section 8 lottery system" unfair and unconstitutional under the see fairness doctrine and fair Notice and under the Equal protection Clause and due process Clause for the following reasons.

The process as to the section 8 lottery system is Bias and allow ~~the~~ two Classes people to have a unfair advantage over minority Classes Black or 3.09% and asian or 3.03% and hispanic is 49.2% of the population and white alone percent is 65.6% this is not a fair process and favors to Classes of people.